

EXHIBIT II

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF EUGENE O'REILLY

I, Eugene O'Reilly, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was in New York City when the terrorist attacks of the World Trade Center Towers occurred.

4. I was an off-duty lieutenant in the New York Fire Department on September 11, 2001. From my home, I saw the second plane hit the World Trade Centers, and I knew it was time to go to work. Other off-duty firefighters and I commandeered a New City Transit Authority bus to take us to the World Trade Centers. I arrived right as the second building fell, and I worked on-site almost continuously for the next three days. I was injured when the warning horn, which alerted responders to falling debris, sounded. To escape the falling debris, I was forced to jump off

the bulkhead of the pier onto a barge. I broke my right shoulder jumping onto the barge. Due to my injury, I was no longer able to work as a firefighter.

5. I received physical injuries through my efforts as a first responder. Through my work at Ground Zero, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. As a first responder, I saw the bodies of the deceased intermingled with the wreckage. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001, which have been certified: a broken right shoulder, prostate cancer, and breathing problems.

7. September 11, 2001 was a traumatic event. During the rescue efforts, I saw the carnage left behind, including the bodies of deceased. I will never forget having to pick up the pieces of human remains. As I worked, I recall thinking how easily it could have been that those remains were the remains of my family and friends. During and after the terrorist attacks, I lost many coworkers and friends. And, as time went on, many more of my neighbors and friends who continued to work in and around the World Trade Centers after the terrorist attacks become ill as a result, which was very hard for me. It was (and still is) incredibly hard to overcome the trauma of the attacks, and I think about what I witnessed every day.

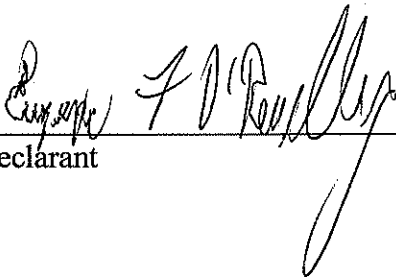
8. I sought medical attention for my injuries. I underwent surgery to repair my broken right shoulder. After my shoulder surgery, I underwent months of physical therapy. In March 2012, I was diagnosed with prostate cancer linked to the attacks. And, in March 2016, I began experiencing breathing problems linked to the attacks, and was subsequently diagnosed with asthma. Currently, I continue to receive medical treatment for my prostate cancer and breathing

issues. I have a portable breathing device for my breathing issues. Attached as Exhibit B to this Declaration is a true and correct copy of relevant medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim (Claim Number VCF0023682) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred as a result of the September 11, 2001 terrorist attacks, and my claim was determined to be eligible.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 20th day of December 2019.



Declarant

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**